

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ,
MARCUS MARTIN, NATALIE ROMERO,
CHELSEA ALVARADO, THOMAS BAKER
and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOTT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

PLAINTIFFS’ PROPOSED JUROR QUESTIONNAIRE

Plaintiffs respectfully request that the Court include the following questions in the juror questionnaire for trial in this matter.

1. Full name: _____
2. Date of Birth: _____
3. Gender: _____
4. Race / ethnic background:
 - a. White / Caucasian
 - b. Black / African American
 - c. Asian
 - d. Hispanic / Latino
 - e. Native Hawaiian / Other Pacific Islander
 - f. American Indian / Alaska Native
 - g. Other: _____
5. Where were you born? _____
 - a. Where were you raised? _____
6. Current address (including city / county):

a. How long have you lived there? _____
7. What other areas or neighborhoods have you lived in over the past 10 years?

8. This trial is expected to last approximately four weeks. Do you have any immovable scheduling conflicts between October 25, 2021 and November 19, 2021?

YES _____ NO _____
 - a. If yes, please explain: _____

9. Do you have any impairments (*i.e.*, vision, hearing, other medical problems) that may affect your jury service? _____
YES _____ NO _____
 - a. If yes, please explain: _____

10. Marital status: *(please circle all that apply)*

a. Single / never married	e. Divorced
b. Married	f. Widowed
c. Live with significant other	g. Live with parent(s)
d. Separated	h. Live with roommate(s)

11. If you have any children, please indicate the age, gender, education, and occupation of each:

<u>AGE</u>	<u>GENDER</u>	<u>EDUCATION LEVEL AND OCCUPATION</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

12. What is the highest level of education you have completed?

13. If you earned a degree after high school, what was your major area(s) of study?

14. What is your current employment status? *(please circle all that apply)*

a. Employed full-time
b. Employed part-time
c. Self-employed
d. Work from home
e. Homemaker
f. Retired
g. Disabled and unable to work
h. Unemployed / laid off
i. Student

(if student what area of
study? _____)

15. What is your current occupation, name of employer, title, and length of that employment (if retired or unemployed, complete based on your last job)?

16. What other jobs have you held, and for how long?

17. If you have a spouse / partner with whom you reside, is that person currently employed?

YES NO

a. Please provide their occupation and job title (if retired or unemployed, complete based on their last job):

18. What is the total annual gross income of your household?

a. Under \$25,000	e. \$100,000-\$149,999
b. \$25,000-\$49,999	f. \$150,000-\$199,999
c. \$50,000-\$74,999	g. Over \$200,000
d. \$75,000-\$99,999	

19. What political party do you usually support? (*Please circle one*)

- a. Democratic
- b. Republican
- c. Independent
- d. Libertarian
- e. No specific party / depends on the candidate
- f. Do not vote
- g. Other (please specify) _____

20. Who did you vote for in the 2016 Presidential Election? (*Please circle one*)

- a. Donald Trump (Republican)
- b. Hillary Clinton (Democrat)
- c. Gary Johnson (Libertarian)
- d. Jill Stein (Green)
- e. Other (please specify) _____

21. Who did you vote for in the 2020 Presidential Election? (*Please circle one*)

- a. Donald Trump (Republican)
- b. Joseph Biden (Democrat)
- c. Jo Jorgensen (Libertarian)
- d. Howie Hawkins (Green)
- e. Other (please specify) _____

22. In general, do you consider yourself to be:

Liberal Moderate Conservative Other: _____

23. What is your current religion, if any? (Please circle one)

- a. Agnostic
- b. Atheist
- c. Buddhist
- d. Christian (please specify) _____
- e. Hindu
- f. Jewish
- g. Muslim
- h. Other (please specify) _____

24. Please list any hobbies or special interests you have:

25. Please list any clubs, associations, or groups to which you or your spouse / partner belong or in which either of you participates (i.e., civic, social, religious, charitable, volunteer, political, sporting, professional, business, or recreational):

a. Self: _____

b. Spouse / Partner: _____

26. What were the last three books you read / podcasts you listened to?

1. _____
2. _____
3. _____

27. Who are the three publicly known people you admire **most** and why?

1. _____
2. _____
3. _____

28. Who are the three publicly known people you admire **least** and why?

1. _____
2. _____
3. _____

29. Would you say that you seek out positions of leadership when you participate with others in your employment or other activities?

- a. All the time
- b. Often
- c. Sometimes
- d. Rarely
- e. Never

30. Have you, a family member, or a close friend ever worked in or made any application for employment with any law enforcement or corrections agency or court system, whether local, state, or federal? YES NO

a. If YES, please state the person's relationship to you and describe the job and the name of the law enforcement agency / court system:

31. Would you tend to give more weight or less weight to the testimony of a law enforcement officer as compared to a non-law enforcement witness?

- a. More weight
- b. About the same about of weight
- c. Less weight
- d. I don't know / unsure

32. Do you have regular contact with any law enforcement agencies, employees, or officers through your work, your neighborhood, or in your social life?

 YES NO

a. If YES, please explain:

33. Please rate how strongly you agree or disagree with the following statements:

a. *“Because law enforcement officers have such dangerous jobs, it is not right to second guess decisions they make while on duty.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

b. *“The criminal justice system is biased against racial and ethnic minorities.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree

v. Strongly disagree

c. *“Police in this county treat White and Black people equally.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

34. Have you ever served in the military?

a. If YES, please list the branch, highest rank, approximate dates of service, and whether you served in combat.

35. Are you currently or have you ever been a member of, volunteered time with, or given financial support to any group or organization which is concerned with ethnic or racial issues? (e.g., NAACP, ACLU, Jewish Community Centers (“JCC”), Institute for Historical Review, Color of Change, League of the South, League of Latin American Citizens (“LULAC”), National Policy Institute, etc.)

_____ YES _____ NO

a. If YES, please list the groups or organizations and explain the type of support given: _____

36. Are you currently or have you ever been a member of any private club, civic, professional, or fraternal organization which limits its membership on the basis of race, ethnic origin, gender, or religion? (e.g., The Wing, Hillel, fraternities / sororities, Boy Scouts / Girl Scouts, Patriot Front, etc.) _____ YES _____ NO

a. If YES, please list the groups or organizations and explain your role:

37. How strongly do you agree or disagree with the following statements:

a. *“Ethnic minorities should have a specific organization that advocates for them.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

b. *"White / Caucasian people should have a specific organization that advocates for them."*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly agree

38. Are there any charities or organizations to which you have made a donation to in the last 5 years?

 YES NO

a. If YES, please list the charities or organizations to which you have contributed in the past five years:

39. Do you currently, or have you ever, made a financial contribution or been a member of any victims' rights group?

 YES NO

a. If YES, please identify the group and your participation:

40. How do you get your news? Please identify the names of any source(s) you use, and fill in all that apply:

- a. Newspapers? (e.g., *The Central Gazette, The Weekly Chronicle, The Daily Progress, The New York Times, USA Today, etc.*)

- b. Radio? (including Talk Radio and podcasts)

- c. Television or Cable News? (e.g., FOX, CNN, MSNBC, etc.)

- d. Internet? (e.g., *The Daily Progress, Breitbart News, Wall Street Journal, Daily Stormer, Washington Post, HuffPost, The National Review, New York Times, etc.*)

- e. Social Media (e.g., Facebook, Twitter, Discord, Reddit, Parler, etc.)?

41. Generally, how much trust do you have in the news media, as an institution?

 A great deal Some A little None at all

42. Have you, a family member, or a close friend ever been a party in a civil lawsuit?

 YES NO

a. If YES, were you / they (check all that apply):

	PLAINTIFF	DEFENDANT
Yourself	_____	_____
Family Member	_____	_____
Close friend	_____	_____

b. If YES, please explain the type of lawsuit, when the lawsuit took place, and the outcome: _____

43. Have you ever been in a situation where you could have sued a business or person and decided not to do so? _____ YES _____ NO

a. If YES, please explain: _____

44. How strongly do you agree or disagree with the following statement: "*Jurors tend to give excessive damages awards.*"

- a. Strongly agree
- b. Somewhat agree
- c. Neutral / neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree

45. Do you support legislative reform efforts to place caps or limits on the amounts of money juries can award? _____ YES _____ NO

46. In criminal cases, prosecutors are required to prove the defendant's guilt "beyond a reasonable doubt," while in civil cases the plaintiff's standard of proof is lower. In civil cases, plaintiffs must show that it is more likely than not that the claims made against the defendants are true. Do you believe that this standard is unfair to defendants and/or that plaintiffs should have a higher burden of proof? _____ YES _____ NO

a. Please explain your views: _____

47. Would you say that as an individual you are more driven by scientific facts (*i.e.*, what you know to be true based on scientific evidence / proof) or by your feelings and intuitions (*i.e.*, gut instinct, faith, spiritual beliefs)?

- a. Science / evidence / data
- b. Intuition / gut / faith

48. Under the law, the facts at issue in the trial are for the jury to determine. The law applicable to the allegations in the case is something on which the court will instruct you. You are required to accept the law as the judge explains it to you regardless of any opinions you

might have as to what the law is or should be. Would you have any difficulty following that instruction if was at odds with your own views of what the law should be?

YES NO UNSURE

a. If yes, please explain: _____

49. Do you believe that most people who sue others in court have legitimate grievances?

YES NO

50. Do you believe that plaintiffs in personal injury lawsuits often exaggerate their symptoms / injuries in order to recover higher damages awards? YES NO

a. If yes, please explain how you came to this belief and if there are any specific cases that come to mind: _____

51. Do you think that damages awarded by juries these days are generally:

Too low About right Too high Unsure

52. Do you believe juries should award damages for personal injury, pain, or suffering?

YES NO

a. If NO, please explain: _____

53. Have you ever been a victim of a traumatic event (*i.e.*, car accident, physical injury, mugging / burglary)? YES NO

a. If YES, did you report the incident to the police? YES NO

i. If YES, were you satisfied with the way the report / complaint was handled? YES NO

54. Have you, a family member, or a close friend ever suffered:

	<u>YES</u>	<u>NO</u>
Chronic pain or illness	_____	_____
Prolonged psychological / emotional distress	_____	_____

a. If YES to either, please explain (including if you / they had to stop working due to the condition): _____

55. How strongly would you agree or disagree with the following statement: "*Mental health treatment is a waste of time.*"

- a. Strongly agree
- b. Somewhat agree
- c. Neutral / Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree

56. Do you believe that Post-traumatic Stress Disorder ("PTSD") is a real mental health condition? YES NO UNSURE

57. How strongly would you agree or disagree with the following statement: "*PTSD is over-diagnosed.*"

- a. Strongly agree
- b. Somewhat agree
- c. Neutral / Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree

58. Have you, a family member, or a close friend ever experienced (whether diagnosed or undiagnosed) PTSD or PTSD-like symptoms? YES NO

59. How strongly would you agree or disagree with the following statement: "*PTSD is a disorder that only affects military service members.*"

- a. Strongly agree
- b. Somewhat agree
- c. Neutral / Neither agree nor disagree
- d. Somewhat disagree
- e. Strongly disagree

60. Have you ever served on a jury? YES NO

a. If YES, please state when, the type of case (civil, criminal, or grand jury), whether the jury reached a verdict, and whether you served as the foreperson:

b. If YES, please briefly note how you felt about your overall experience as a juror and if it changed your view of lawsuits / the criminal justice system in the U.S.:

61. If you served on a jury before, is there anything about your prior jury service that would impact your ability to be a fair and impartial juror on this case?

YES NO

62. Do you hold any views, beliefs, or opinions that would make it difficult for you to sit in judgment of another person? _____ YES _____ NO

a. If YES, please explain: _____

63. Have you, any member of your immediate family, or a close personal friend ever been in any incident involving a motor vehicle that resulted in injury? _____ YES _____ NO

a. If YES, please explain: _____

64. Have you, a family member, or a close friend ever participated in a march / protest (e.g., The Women's March, Anti-Tax Marches, Occupy Wall Street, March for Life, Voting Rights, Anti-Mask / Lockdown Mandate protests, Anti-War Movements, Political campaign rally)?
(Please identify each such march / protest you, a family member, or a close friend have participated in)

- a. Yes, me (please explain) _____
- b. Yes, a family member (please explain) _____
- c. Yes, a close friend (please explain) _____
- d. No

65. Have you, a family member, or a close friend ever been arrested or injured in a march / protest? *(Please select all that apply)*

	ARRESTED	INJURED
Yourself	_____	_____
Family member	_____	_____
Close friend	_____	_____

66. How strongly do you approve or disapprove of protest / demonstrations that violate ordinances (i.e., continue after curfews, are unpermitted, "disturb the peace," etc.)?

- a. Strongly approve
- b. Somewhat approve
- c. Neutral / Neither approve nor disapprove
- d. Somewhat disapprove
- e. Strongly disapprove

67. How strongly do you agree with the following statements:

- a. *"In the United States, people are free to peacefully protest."*
 - i. Strongly agree
 - ii. Somewhat agree
 - iii. Neutral / Neither agree nor disagree
 - iv. Somewhat disagree

v. Strongly disagree

b. *“Events with both protestors and counter-protestors are more likely to be violent than events with just protestors.”*

- Strongly agree
- Somewhat agree
- Neutral / Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

c. *“Violence could be justified to advance a party’s political goals.”*

- Strongly agree
- Somewhat agree
- Neutral / Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

68. Which of the following do you consider to be a form of ***peaceful / nonviolent*** protest?

YES NO UNSURE

a. Blocking traffic	_____	_____	_____
b. Counterprotests (protests opposing an existing protest)	_____	_____	_____
c. Writing on walls / graffiti	_____	_____	_____
d. Occupation / sit-down strike (occupying a public building or space)	_____	_____	_____
e. Picketing (congregating outside a place of work or location where an event is taking place)	_____	_____	_____
f. Photobombing (disrupting an event being broadcast live)	_____	_____	_____

69. Are you familiar with the Black Lives Matter (“BLM”) movement?

_____ YES _____ NO

a. If YES, have you: (Please select all that apply)

YES NO

• Shared posts in support of BLM on social media	_____	_____
• Shared posts against BLM on social media	_____	_____
• Attended protests in support of BLM	_____	_____
• Attended protests against BLM	_____	_____
• Donated to funds supporting BLM	_____	_____

b. Has a close friend or family member: Please select all that apply)

YES NO

• Shared posts in support of BLM on social media	_____	_____
---	-------	-------

- Shared posts **against** BLM on social media _____
- Attended protests in support of BLM _____
- Donated to funds supporting BLM _____

c. How would you rate your overall opinion on the Black Lives Matter movement?

- i. Extremely favorable
- ii. Somewhat favorable
- iii. Neutral / Neither favorable nor unfavorable
- iv. Somewhat unfavorable
- v. Extremely unfavorable

d. Overall, how much do you approve or disapprove of the way police responded to the Black Lives Matter protests during the summer of 2020?

- i. Strongly approve
- ii. Somewhat approve
- iii. Neutral / Neither approve nor disapprove
- iv. Somewhat disapprove
- v. Strongly disapprove

70. Are you familiar with the All Lives Matter movement? _____ YES _____ NO

a. If YES, have you: (Please select all that apply)

	YES	NO
• Shared posts in support of the All Lives Matter movement on social media	_____	_____
• Shared posts against the All Lives Matter movement on social media	_____	_____
• Attended protests in support of All Lives Matter	_____	_____
• Donated to funds supporting All Lives Matter	_____	_____

b. Has a close friend or family member: Please select all that apply)

	YES	NO
• Shared posts in support of the All Lives Matter movement on social media	_____	_____
• Shared posts against the All Lives Matter movement on social media	_____	_____
• Attended protests in support of All Lives Matter	_____	_____
• Donated to funds supporting All Lives Matter	_____	_____

c. How would you rate your overall opinion on the All Lives Matter movement?

- i. Extremely favorable
- ii. Somewhat favorable
- iii. Neutral / Neither favorable nor unfavorable

- iv. Somewhat unfavorable
- v. Extremely unfavorable

71. Are you familiar with the Blue Lives Matter movement? _____ YES _____ NO

a. If YES, have you: (*Please select all that apply*)

	YES	NO
• Shared posts in support of the Blue Lives Matter movement on social media	_____	_____
• Shared posts against the Blue Lives Matter movement on social media	_____	_____
• Attended protests in support of Blue Lives Matter	_____	_____
• Donated to funds supporting Blue Lives Matter	_____	_____

b. Has a close friend or family member: *Please select all that apply*)

	YES	NO
• Shared posts in support of the Blue Lives Matter movement on social media	_____	_____
• Shared posts against the Blue Lives Matter movement on social media	_____	_____
• Attended protests in support of Blue Lives Matter	_____	_____
• Donated to funds supporting Blue Lives Matter	_____	_____

c. How would you rate your overall opinion on the Blue Lives Matter movement?

- i. Extremely favorable
- ii. Somewhat favorable
- iii. Neutral / Neither favorable nor unfavorable
- iv. Somewhat unfavorable
- v. Extremely unfavorable

72. Are you familiar with “Antifa”? _____ YES _____ NO

a. If YES, how would you describe Antifa?

b. If YES, how would you rate your overall opinion on Antifa?

- i. Extremely favorable
- ii. Somewhat favorable
- iii. Neutral / Neither favorable nor unfavorable
- iv. Somewhat unfavorable
- v. Extremely unfavorable

c. Do you believe that Antifa exists only to support Black people / ethnic minorities?
____ YES ____ NO

d. Which do you think is a bigger threat in America right now:
i. White supremacists
ii. Antifa
iii. Both equally
iv. I don't know / Unsure

73. Are you familiar with "QAnon"? ____ YES ____ NO

a. If YES, how would you rate your overall opinion of QAnon?
i. Extremely favorable
ii. Somewhat favorable
iii. Neutral / Neither favorable nor unfavorable
iv. Somewhat unfavorable
v. Extremely unfavorable

b. Are you currently a member of at least 1 QAnon social media group (*i.e.*, on Facebook, WhatsApp, Reddit, Twitter, Instagram, Parler, etc.)?
____ YES ____ NO

c. Do any of your family members or close friends identify as QAnon followers?
____ YES ____ NO

74. Which of the following statements best describes your view on statues of Confederate war heroes (*e.g.*, Robert E. Lee, Stonewall Jackson)?

____ Southern pride ____ Historical monuments ____ Symbols of racism

75. How strongly do you approve or disapprove of the removal of Confederate statutes:

a. Strongly approve
b. Somewhat approve
c. Neutral / Neither approve nor disapprove
d. Somewhat disapprove
e. Extremely disapprove

76. How strongly do you agree or disagree with the following statements:

a. "*The First Amendment (right to free speech) unequally protects majority opinions over minority viewpoints.*"
i. Strongly agree
ii. Somewhat agree
iii. Neutral / Neither agree nor disagree
iv. Somewhat disagree
v. Strongly disagree

b. *"The current political climate prevents me from saying things I believe because others might find them offensive."*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

77. How concerned are you with the amount of _____ in the United States today?

- a. Prejudice against people of Jewish descent / Jewish culture
 - i. Extremely concerned
 - ii. Moderately concerned
 - iii. Somewhat concerned
 - iv. Slightly concerned
 - v. Not at all concerned
- b. Racism against Black / African American people
 - i. Extremely concerned
 - ii. Moderately concerned
 - iii. Somewhat concerned
 - iv. Slightly concerned
 - v. Not at all concerned
- c. Racism against Hispanic / Latino people
 - i. Extremely concerned
 - ii. Moderately concerned
 - iii. Somewhat concerned
 - iv. Slightly concerned
 - v. Not at all concerned
- d. Racism against White / Caucasian people
 - i. Extremely concerned
 - ii. Moderately concerned
 - iii. Somewhat concerned
 - iv. Slightly concerned
 - v. Not at all concerned

78. How strongly do you agree or disagree with the following statements:

- a. *"Black / African American people commit more violent crimes than White / Caucasian people."*
 - i. Strongly agree
 - ii. Somewhat agree
 - iii. Neutral / Neither agree nor disagree
 - iv. Somewhat disagree

v. Strongly disagree

b. *“Hispanic / Latino people commit more violent crimes than White / Caucasian people.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

79. How much of a problem, if at all, do you think antisemitism is in the United States today?

- a. A very serious problem
- b. Somewhat of a problem
- c. Not much of a problem
- d. Not a problem at all

80. Over the past 5 years, do you think antisemitism in the United States has...

- a. Increased a lot
- b. Increased somewhat
- c. Stayed the same
- d. Decreased a little
- e. Decreased a lot

81. How strongly do you agree or disagree with the following statements:

a. *“Jews have too much power in the business world.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

b. *“Jews have too much control over the global media.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

c. *“Jews think they are better than other people.”*

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

d. “*Jewish values are harmful to the youth of America.*”

- i. Strongly agree
- ii. Somewhat agree
- iii. Neutral / Neither agree nor disagree
- iv. Somewhat disagree
- v. Strongly disagree

82. As compared to 30 years ago, do you think race relations in the United States have gotten...

- a. Better
- b. Stayed about the same
- c. Worse

83. How often do you have discussions about race and race relations?

- a. All the time
- b. Often
- c. Sometimes
- d. Rarely
- e. Never

84. How often do you have *positive* interactions with someone of a different race?

- a. All the time
- b. Often
- c. Sometimes
- d. Rarely
- e. Never

85. How often do you have *negative* interactions with someone of a different race?

- a. All the time
- b. Often
- c. Sometimes
- d. Rarely
- e. Never

86. Have you, a family member, or a close friend ever felt discriminated against because of your / their religion? _____ YES _____ NO

a. If YES, please briefly describe the incident(s):

87. How would you describe your feelings toward the following groups of people?

a. White / Caucasian people

- i. Extremely favorable
- ii. Somewhat favorable
- iii. Neutral / Neither favorable nor unfavorable

- iv. Somewhat unfavorable
- v. Extremely unfavorable

- b. People of Jewish descent / Jewish culture
 - i. Extremely favorable
 - ii. Somewhat favorable
 - iii. Neutral / Neither favorable nor unfavorable
 - iv. Somewhat unfavorable
 - v. Extremely unfavorable

- c. Black / African American people
 - i. Extremely favorable
 - ii. Somewhat favorable
 - iii. Neutral / Neither favorable nor unfavorable
 - iv. Somewhat unfavorable
 - v. Extremely unfavorable

- d. Hispanic / Latino people
 - i. Extremely favorable
 - ii. Somewhat favorable
 - iii. Neutral / Neither favorable nor unfavorable
 - iv. Somewhat unfavorable
 - v. Extremely unfavorable

88. How strongly would you agree or disagree with the following statements:

- a. *“This country would be better with less ethnic diversity.”*
 - i. Strongly agree
 - ii. Somewhat agree
 - iii. Neutral / Neither agree nor disagree
 - iv. Somewhat disagree
 - v. Strongly disagree

- b. *“The state of race relations in this country is generally good.”*
 - i. Strongly agree
 - ii. Somewhat agree
 - iii. Neutral / Neither agree nor disagree
 - iv. Somewhat disagree
 - v. Strongly disagree

- c. *“Immigration is a big problem in this country.”*
 - i. Strongly agree
 - ii. Somewhat agree
 - iii. Neutral / Neither agree nor disagree
 - iv. Somewhat disagree
 - v. Strongly disagree

89. Are you familiar with the Proud Boys organization? YES NO

a. If yes, do you know anyone who is a member of the organization?
 YES NO

b. How would you rate your opinion of the Proud Boys organization?
i. Extremely favorable
ii. Somewhat favorable
iii. Neutral / Neither favorable nor unfavorable
iv. Somewhat unfavorable
v. Extremely unfavorable

90. Are you familiar with any of the following organizations / groups?

	<u>YES</u>	<u>NO</u>
Vanguard America	_____	_____
Traditionalist Worker Party	_____	_____
League of the South	_____	_____
National Socialist Movement	_____	_____
Nationalist Front	_____	_____
Fraternal Order of the Alt-Knights	_____	_____
Loyal White Knights of the Ku Klux Klan	_____	_____
East Coast Knights of the Ku Klux Klan	_____	_____
(a/k/a East Coast Knights of the True Invisible Empire)	_____	_____
Identity Evropa	_____	_____

a. If you answered YES to any of the above, please explain how you are familiar with the organization(s) and if you know anyone who is or was ever a member of the organization(s):

91. Are you familiar with the Unite the Right rally that took place in Charlottesville, Virginia from August 11-12, 2017? YES NO

a. If YES, how would you describe the amount of media coverage you followed about the rally?

A lot (read many articles or watched many television accounts)
 A moderate amount (just basic coverage in the news)
 A little (barely heard about it)

b. Did you follow the media / news surrounding the death of Heather Heyer and injuries to others at the Unite the Right rally? YES NO

i. If YES, how would you describe the amount of media coverage you followed about it?

A lot (read many articles or watched many television accounts)
 A moderate amount (just basic coverage in the news)
 A little (barely heard about it)

c. If YES to either of the above, have you continued following the news surrounding the rally? YES NO

i. If YES, how would you describe the amount of media coverage you followed about it?

A lot (read many articles or watched many television accounts)
 A moderate amount (just basic coverage in the news)
 A little (barely heard about it)

92. Are you familiar with the organization “Integrity First For America”?

YES NO

a. If YES, please explain how you are familiar with them:

93. This case involves allegations against the Defendants—identified as organizers and promoters of the “Unite the Right” rally held in Charlottesville on August 11-12, 2017—by the Plaintiffs—private citizens who attended the Unite the Right Rally as counter-protestors—that the Defendants were responsible for the injuries that the Plaintiffs suffered during Unite the Right. Have you heard or read anything about this case?

YES NO

a. If YES, please explain what you have heard about the case:

94. Is there anything about the nature of the allegations or the parties involved that would make it difficult for you to be a fair and impartial juror in such a case?

YES NO

a. If YES, please explain: _____

95. The following names are a list of the Plaintiffs and Defendants in this case. Do you know / have any personal connection whatsoever to any of the following individuals?

PLAINTIFFS

Elizabeth Sines
Seth Wispelwey

DEFENDANTS

Jason Kessler
Richard Spencer

Marissa Blair	Christopher Cantwell
Devin Willis	James Alex Fields, Jr.
April Muniz	Andrew Anglin
Marcus Martin	Robert "Azzmador" Ray
Natalie Romero	Nathan Damigo
Chelsea Alvarado	Elliot Kline a/k/a Eli Mosley
Thomas Baker	Matthew Heimbach
	Matthew Parrott
	Michael Hill
	Michael Tubbs
	Jeff Schoep
	Augustus Sol Invictus
	Michael "Enoch" Peinovich

YES NO

a. If YES, please explain: _____

96. The following names are a list of attorneys representing the Plaintiffs and the Defendants. Do you know, or have you ever been represented by these lawyers or their law firms?

Alexandra Kendal Conlon (Kaplan Hecker & Fink LLP)
Benjamin D. White (Kaplan Hecker & Fink LLP)
Emily C. Cole (Kaplan Hecker & Fink LLP)
Jonathan R. Kay (Kaplan Hecker & Fink LLP)
Julie E. Fink (Kaplan Hecker & Fink LLP)
Michael L. Bloch (Kaplan Hecker & Fink LLP)
Raymond P. Tolentino (Kaplan Hecker & Fink LLP)
Roberta A. Kaplan (Kaplan Hecker & Fink LLP)
Yotam Barkai (Kaplan Hecker & Fink LLP)
Agbeko C. Petty (Paul, Weiss, Rifkind, Wharton & Garrison LLP)
Arpine S. Lawyer (Paul, Weiss, Rifkind, Wharton & Garrison LLP)
Jessica E. Phillips (Paul, Weiss, Rifkind, Wharton & Garrison LLP)
Karen L. Dunn (Paul, Weiss, Rifkind, Wharton & Garrison LLP)
Makiko B. Hiromi (Paul, Weiss, Rifkind, Wharton & Garrison LLP)
Nicholas A. Butto (Paul, Weiss, Rifkind, Wharton & Garrison LLP)
William A. Isaacson (Paul, Weiss, Rifkind, Wharton & Garrison LLP)
Katherine M. Cheng (Boies Schiller Flexner LLP)
Alan Levine (Cooley LLP)
Alexandra Eber (Cooley LLP)
Amanda L. Liverzani (Cooley LLP)
Caitlin B. Munley (Cooley LLP)
Daniel P. Roy, III (Cooley LLP)
David E. Mills (Cooley LLP)
Robert T. Cahill (Cooley LLP)

Samantha A. Strauss (Cooley LLP)
Joshua M. Siegel (Cooley LLP)
John B. Rottenborn (Woods Rogers PLC)
Elmer Woodard
James E. Kolenich (Kolenich Law Office)
Bryan Jones (Bryan Jones Legal)
David L. Campbell (Duane, Hauck, Davis & Gravatt, P.C.)
Justin Saunders Gravatt (Duane, Hauck, Davis & Gravatt, P.C.)
William Edward ReBrook, IV (the ReBrook Law Office)
Joshua Smith (Smith LLC)

YES NO

a. If YES, please explain: _____

97. Are you or any of your close friends or family members employed by any of the lawyers or law firms in this case? YES NO

a. If yes, please explain: _____

98. Do you know any of the following individuals?

Deborah E. Lipstadt, Ph.D.
Stephen Fenton, P.E.
Kathleen M. Blee, Ph.D.
Peter Simi, Ph.D.

YES NO

a. If yes, please explain: _____

99. Do you have any moral or religious beliefs which would prevent you from rendering a fair and impartial verdict in this case, based solely on the evidence you will hear in the courtroom and the court's instructions on the law?

YES NO

a. If YES, please explain: _____

Date: August 24, 2021

Respectfully submitted,



Roberta A. Kaplan (pro hac vice)
Julie E. Fink (pro hac vice)
Gabrielle E. Tenzer (pro hac vice)
Michael L. Bloch (pro hac vice)
Yotam Barkai (pro hac vice)
Emily C. Cole (pro hac vice)
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I hereby certify that on August 24, 2021, I also served the following non-ECF participants via mail and electronic mail:

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